

REMARKS

Request for Reconsideration

Applicants have carefully considered the matters raised by the Examiner in the outstanding Office Action but remain of the opinion that patentable subject matter is present. Applicants respectfully request reconsideration of the Examiner's position based the following remarks.

Claims Status

Claims 1-24 are pending. Claims 21-24 have been withdrawn while Claims 1-20 are currently under prosecution.

The Present Invention

Claims 1-20 are directed to a method for forming an anti-glare layer. The anti-glare layer is intended for use as a front plate on a display. In other words, it is the front layer of the display through which an image is transmitted. An observer observes an image formed on the display through the anti-glare layer. Thus, the image must pass completely through the anti-glare layer.

The claimed anti-glare layer has a discontinuous layer of individual ink droplets. The purpose of an anti-glare layer is to blur an image which can be reflected off of the surface of the display. The blurring of the reflected image is intended so as to make the reflected image almost unnoticeable. In other words, the purpose of the anti-glare layer is to jumble any reflective light and prevent it from being noticeable to the observer while allowing the transmitted image to be viewed by the observer, see the bottom paragraph on page 2.

Prior Art Rejection

The Examiner has put forward the following six Prior Art Rejections.

- (1) Claims 1, 2, 4, 5, 11-13 and 19 are rejected as unpatentable over a combination of Shoshi in combination with George and Ketchpel;
- (2) Claim 3 is rejected as being unpatentable over a combination of Shoshi, Ketchpel, George and Namoiika;
- (3) Claims 6-10, 15, 17 and 20 are rejected as being unpatentable over a combination of Shoshi, Ketchpel, George, Ohishi;
- (4) Claim 14 is rejected as being unpatentable over a combination of Shoshi, Ketchpel, George, and Logan;

- (5) Claim 16 is rejected as being unpatentable over a combination of Shoshi, Ketchpel, George, Ohishi and Hirose; and
- (6) Claim 18 is rejected as being unpatentable over a combination of Shoshi, Ketchpel, George, Ohishi and Matsunaga.

The Examiner noted on page 6, of the Office Action that Shoshi, George, Ohishi, Logan, Hirose and Matsunaga do not teach a discontinuous layer. Thus, the Examiner cited Ketchpel for a discontinuous layer. Applicants submit that, for a number of reasons, Ketchpel should not be combined with the other references and, even if combined, would not result in the present Invention.

First, Ketchpel does not teach an anti-glare layer. Ketchpel teaches a transflector, see Title of Ketchpel.

A transflector, as taught by Ketchpel, is intended to be positioned between the display and the light source. The purpose of the transflector is to reflect light while partially transmitting light from the light source to the display. In order to reflect the light, Ketchpel uses metal islands 16, see column 2, line 36. These metal islands are specifically intended to allow for some passage of light source and to reflect incident light from the

outer atmosphere, see column 1, lines 21-23 and column 2, lines 52-55 and 61-64.

Thus, one who is making an anti-glare layer, such as the teachings in Shoshi, would not look to the teachings in Ketchpel when deciding an anti-glare layer for a number of reasons.

First, an anti-glare layer is placed on top of a display to allow the image which is being shown by the display to pass through the anti-glare layer while blurring the reflected light. Ketchpel has his transflector positioned in a different location, between the light source and the display and the transflector only allows for a partial passage of light through the transflector. Thus, if one were to take the transflector of Ketchpel and use it as an anti-glare layer, only portions of the displayed image would pass through Ketchpel's transflector. If only a portion of the image passes through the transflector, then not all of the image will pass from the display to the observer. In other words, the transflector of Ketchpel will not work as an anti-glare layer. Thus, one of skill

in the art is not going to look to the transflector of Ketchpel for assistance in making an anti-glare layer such as the one taught in Shoshi.

A transflector, such as the one taught in Ketchpel, is positioned in a different place than an anti-glare layer. The transflector, as taught in Ketchpel, has a different purpose than an anti-glare layer. A transflector will not function as an anti-glare layer because a transflector does not completely transmit the image, it only partially transmits light through the transflector layer. Respectfully, one of skill in the art would not look to the transflector of Ketchpel and combine it with teachings of Shoshi to anti-glare layers. Thus, it is improper to combine Ketchpel with Shoshi.

Furthermore, even if one were to take the transflector layer of Ketchpel and apply his teachings to an anti-glare layer, the resulting structure would not function as an anti-glare layer. It would not function as an anti-glare layer because the transflector layer of Ketchpel only partially transmits light. In contrast, an anti-glare layer has to transmit the image to allow an observer to observe the image. Thus, if one were to combine the

teachings of Ketchpel with the teachings of, for example, Shoshi, the resulting structure would be inoperative as an anti-glare layer because Ketchpel teaches only partial transmission, not full transmission.

Respectfully, the claims, as present herein, are patentable over the cited references taken along or in combination.


Conclusion

In view of the foregoing, it is respectfully submitted that the Application is in condition for allowance and such action is respectfully requested.

Should any fees or extensions of time be necessary in order to maintain this Application in pending condition, appropriate requests are hereby made and authorization is given to debit account #02-2275.

Respectfully submitted,
LUCAS & MERCANTI, LLP

By:


Donald C. Lucas, Reg. # 31,275
(Attorney for Applicant)
475 Park Avenue South
New York, New York 10016
Tel. # (212) 661-8000

DCL/mr